

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

SEP 02 2014

Clerk of Court

United States of America

Neftali Julian QUIROGA v.

YOB: 1974

POB: United States

Citizenship: USC

Case No. M-14-1719-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 1, 2014 in the county of Hidalgo in the Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21USC 841

defendant did knowingly and intentionally import into the United States from the United Mexican States approximately .78 kilograms of heroin, a Schedule I controlled substance, and defendant did knowingly and intentionally possess with the intent to distribute approximately .78 kilograms of heroin, a Schedule I controlled substance

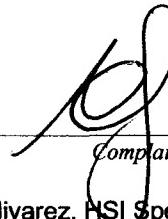
21USC 952

This criminal complaint is based on these facts:

On September 1, 2014 at approximately 0843 hours, a 1980 Ford Fairmount arrived at the Pharr, Texas Port Of Entry (POE). United States Customs and Border Protection Officer (CBPO) Jeronimo Carlos was working the primary inspection area where he obtained a negative declaration for alcohol, tobacco, firearms, and narcotics from the driver, Neftali Julian QUIROGA. CBPO J. Carlos referred QUIROGA to secondary for further inspection.

✓ Continued on the attached sheet.

*Appeared by
Joseph Leonard*



Complainant's signature

Adrian Olivarez, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 9/2/2014



Judge's signature

City and state: McAllen, Texas

Dorina Ramos, U.S. Magistrate Judge

Printed name and title

Attachment "A"

While at secondary inspection, CBP Canine Officer P. Del Bosque conducted a K-9 search of the 1980 Ford Fairmount and the K-9 alerted to the presence of narcotics on the passenger side front fender of the vehicle. Further inspection of the vehicle revealed a compartment in the AC compressor which resulted in the discovery of one (1) bundle wrapped in cellophane tape which contained a dark substance that field tested positive for heroin. The total weight of the 1 bundle of heroin was .78 kilograms.

In a post Miranda interview, QUIROGA admitted he knew there was black tar heroin concealed in his vehicle and that he was going to be paid \$1,500 to transport the black tar heroin to Houston, Texas. QUIROGA admitted he had been smuggling heroin in to the United States for several years and indicated the last time he successfully smuggled heroin in to the United States was approximately three (3) weeks ago.